

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re

CUSTOMS AND TAX ADMINISTRATION
OF THE KINGDOM OF DENMARK
(SKATTEFORVALTNINGEN) TAX
REFUND SCHEME LITIGATION

This document relates to case nos.: 19-cv-01785; 19-cv-01867; 19-cv-01893; 19-cv-01781; 19-cv-01783; 19-cv-01895; 19-cv-01904; 19-cv-01869; 19-cv-01922; 19-cv-01870; 19-cv-01791; 19-cv-01792; 19-cv-01926; 19-cv-01868; 19-cv-01929; 19-cv-01806; 19-cv-01906; 19-cv-01808; 18-cv-04833; 19-cv-01898; 19-cv-01898; 19-cv-01812; 19-cv-01896; 19-cv-01815; 19-cv-01924; 19-cv-10713; 19-cv-01866; 19-cv-01794; 19-cv-01865; 19-cv-01798; 19-cv-01800; 19-cv-01788; 19-cv-01928; 19-cv-01803; 19-cv-01801; 19-cv-01894; 19-cv-01810; 19-cv-01809; 19-cv-01871; 19-cv-01813; 19-cv-01930; 19-cv-01818; 19-cv-01931; 19-cv-01918; 19-cv-01873

MASTER DOCKET

18-md-2865 (LAK)

**DEFENDANTS' MOTION ON FURTHER QUESTIONING OF
CHRISTIAN EKSTRAND**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, dated January 11, 2025, Defendants, by their undersigned attorneys, move the court for an Order (i) to permit further questioning of Christian Ekstrand on issues related to the following matters: 1) a press release issued by the National Audit Office (“NAO”) of Denmark in 2016 refuting the defense of SKAT’s conduct; 2) a public report issued by the NAO in 2016 providing the full reason behind that refutation; 3) email exchanges with Anne Munksgaard regarding efforts to mislead and

withhold information from the NAO inquiry into SKAT's conduct; and 4) a report by an outside law firm retained by the Danish Government in 2017 (Bech Bruun) rejecting the defense of SKAT's conduct, adopting the core of defendant's statute of limitations theory and confirming that SKAT "should have" investigated Sven Nielson; and (ii) granting such other and further relief as this court may deem just and proper.

Dated: New York, New York
January 11, 2025

Respectfully submitted,

/s/ Peter G. Neiman

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CERTIFICATE OF SERVICE

I hereby certify that on January 11, 2025, the foregoing document was served electronically to all parties of record by the CM/ECF system.

/s/ Peter G. Neiman

Peter G. Neiman

January 11, 2025